

F019 LISTING AND DEFINITION OF CONVERSION COATING

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

MAR 26 1987

Mr. A. Allen Hill
Executive Office of the President
Council on Environmental Quality
722 Jackson Place, N.W.
Washington, D.C. 20503

Dear Mr. Hill:

Thank you for your February 27, 1987, letter concerning wastes generated at Continental Can Company's LaCrosse and Milwaukee plants.

The Agency previously determined that the can washer sludges meet the definition of the Environmental Protection Agency (EPA) Hazardous Waste No. F019--wastewater treatment sludges from the chemical conversion coating of aluminum. This determination is based upon the belief that the process used in the can washer system (zirconium phosphatizing) is a chemical conversion coating process. In fact, Continental Can Company itself identified the waste from a similar can washer system at their Olympia, Washington plant as F019 in a delisting petition submitted to the Agency pursuant to 40 CFR __260.20 and 260.22.

Mr. Richard Torrito of Continental Can Company stated in his February 5, 1987, letter that the can washer sludges had been incorrectly identified as F019. Specifically, Mr. Torrito claimed that zirconium phosphatizing is not a chemical conversion coating process. As a result of subsequent telephone conversations between Mr. Torrito and my staff, Continental Can Company has submitted a detailed description of their can washer process so that the Agency can make a determination as to the proper classification of the waste. Once this determination is made, the Agency

will notify Continental Can Company of its decision.

If I can be of any further assistance, please feel free to call me.

Sincerely,

Original Document signed

J. Winston Porter
Assistant Administrator

—